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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

11 GOOGLE LLC,
12 Plaintiff,
13 vs.
14 SONOS, INC.,
15 Defendant.

CASE NO. 3:20-cv-06754-WHA
Related to CASE NO. 3:21-cv-07559-WHA

**DECLARATION OF NIMA HEFAZI IN
SUPPORT OF GOOGLE LLC'S
ADMINISTRATIVE MOTION TO SEAL
PORTIONS OF ITS OPPOSITION TO
SONOS, INC.'S MOTION FOR
SUMMARY JUDGMENT PURSUANT TO
THE COURT'S PATENT SHOWDOWN
PROCEDURE**

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1 I, Nima Hefazi, declare and state as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
 3 practice before this Court. I am of counsel at Quinn Emanuel Urquhart & Sullivan LLP representing
 4 Google LLC (“Google”) in this matter. I have personal knowledge of the matters set forth in this
 5 Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Google’s Administrative Motion to File Under
 7 Seal Portions of its Opposition to Sonos, Inc.’s (“Sonos”) Motion for Summary Judgment Pursuant to
 8 the Court’s Patent Showdown Procedure (“Opposition”). If called as a witness, I could and would
 9 testify competently to the information contained herein.

10 3. Google seeks an order sealing the materials as listed below:

Document	Portions to Be Filed Under Seal	Designating Party
Google’s Opposition	Portions highlighted in yellow and green; portions outlined in red boxes	Google & Sonos (in green)
Declaration of Dr. Dan Schonfeld in Support of Google’s Opposition	Portions highlighted in yellow; portions outlined in red boxes	Google
Exhibit 1 to Declaration of Marc Kaplan in Support of Google’s Opposition (“Kaplan Decl.”)	Portions outlined in red boxes	Google
Exhibit 4 to Kaplan Decl.	Entire Document	Google & Sonos
Exhibit 5 to Kaplan Decl.	Entire Document	Google
Exhibit 8 to Kaplan Decl.	Entire Document	Google
Exhibit 9 to Kaplan Decl.	Entire Document	Google
Exhibit 10 to Kaplan Decl.	Entire Document	Google

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 25 4. Portions of Google’s Opposition, the Declaration of Dr. Dan Schonfeld in Support of
 26 Google’s Opposition, and Exhibits 1, 4, 5, 8, 9, and 10 contain references to Google’s confidential
 27 business information and trade secrets, including details regarding source code, architecture, and
 28 technical operation of Google’s products and functionalities that Sonos accuses of infringement. The

1 specifics of how these functionalities operate is confidential information that Google does not share
2 publicly. Thus, public disclosure of such information could lead to competitive harm to Google as
3 competitors could use these details regarding the architecture and functionality of Google's products
4 to gain a competitive advantage in the marketplace with respect to their competing products. Exhibits
5 4, 5, and 9 also contain excerpts of a deposition transcript and witness statements designated
6 "CONFIDENTIAL BUSINESS INFORMATION" and/or "CONFIDENTIAL SOURCE CODE –
7 ATTORNEYS' EYES ONLY INFORMATION" pursuant to a protective order entered in the
8 International Trade Commission matter *Certain Audio Players and Controllers, Components Thereof,*
9 *and Products Containing Same*, Inv. No. 337-TA-1191. I also understand that a less restrictive
10 alternative than sealing these portions of Google's Opposition, the Declaration of Dr. Dan Schonfeld,
11 and the above exhibits would not be sufficient because the information sought to be sealed is Google's
12 confidential business information and trade secrets but is necessary to Google's Opposition.

13 I declare under penalty of perjury under the laws of the United States of America that to the
14 best of my knowledge the foregoing is true and correct. Executed on May 5, 2022, in Los Angeles,
15 California.

16 DATED: May 5, 2022

17 By: /s/ Nima Hefazi
18 Nima Hefazi

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1 **ATTESTATION**

2 I, Charles K. Verhoeven, am the ECF user whose ID and password are being used to file the
3 above Declaration. In compliance with Civil L.R. 5-1, I hereby attest that Nima Hefazi has concurred
4 in the aforementioned filing.

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6 DATED: May 5, 2022

7 */s/ Charles K. Verhoeven*

8 Charles K. Verhoeven

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